

Message

From: Steven Klafka [sklafka@wingraengineering.com]
Sent: 3/27/2019 9:45:35 PM
To: Ramanauskas, Peter [ramanauskas.peter@epa.gov]
Subject: Re: Guidance for PCB Sampling under Bike Path

Thanks for the quick response Peter.

On 3/27/2019 4:38 PM, Ramanauskas, Peter wrote:

Hello Steve,

Answers to your questions follow:

1. Is there EPA guidance on the frequency of sampling along the bike path? Their plan approved by the DNR calls for sampling every 93 feet. Sampling in the soil adjacent to the bike path found orders of magnitude difference just within a few feet.

The federal regulations provide a characterization guidance under 40 CFR 761 Subpart N; however, it is not mandatory for use. Project Managers are able to use professional judgement related to the adequacy of site characterization based on site specific conditions.

2. The bike path is a highly used and is immediately next to the Goodman Center which has outdoor toddler splash pad, pre-school and 4-year old kindergarden. Should the residential RCL of 0.2 ppm be used to determine if soil should be removed rather than the 10 ppm approved by the DNR?

Under the federal PCB regulations, 10 ppm is an acceptable cleanup level for areas meeting a high-occupancy use if the residual PCB between 1 and 10 ppm is capped and noted within an institutional control for the property.

Regards,
 Peter

From: Steven Klafka <sklafka@wingraengineering.com>
Sent: Wednesday, March 27, 2019 9:40 AM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Guidance for PCB Sampling under Bike Path

Peter,

A PCB investigation has been proposed in Madison, Wisconsin. Madison-Kipp will sample beneath approximately 1,300 feet of the bike path that runs along their property. Depending on the PCB concentrations, the bike path will be removed, soil excavated and the path repaved. Soil will be removed if it exceeds 10 ppm. Below are links to the plan, the DNR approval and a map of the project area.

Since this is my neighborhood, I have closely followed the PCB remediation of this industrial property in a residential neighborhood. It would be appreciated if you could address two questions:

1. Is there EPA guidance on the frequency of sampling along the bike path? Their plan approved by the DNR calls for sampling every 93 feet. Sampling in the soil adjacent to the bike path found orders of magnitude difference just within a few feet.

2. The bike path is a highly used and is immediately next to the Goodman Center which has outdoor toddler splash pad, pre-school and 4-year old kindergarden. Should the residential RCL of 0.2 ppm be used to determine if soil

should be removed rather than the 10 ppm approved by the DNR?

Thanks for your assistance.

Steve Klafka

Links to plan:

https://dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=106707&docName=20190320_35_SIWP.pdf

https://dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=106893&docName=20190322_36_SIWP_Appr.pdf